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Director

Department of Pesticide Regulation



Gray Davis
Governor
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Secretary, California
Environmental
Protection Agency

MEMORANDUM

TO: Pesticide Illness Surveillance Program
Exposure Monitoring Program
Industrial Hygiene Program
Worker Health and Safety Branch

FROM: Chuck Andrews [original signed by C. Andrews]
Branch Chief
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DATE: February 13, 2002

SUBJECT: 2002 PRIORITIES FOR WH&S PARTICIPATION IN EPISODE INVESTIGATIONS

HSM-02044

In FY 2000/2001, we successfully completed several projects that suggest some areas where WH&S can impact the episode investigation process. Those projects include the posting evaluation (HS-1819), the handler illness evaluation (HS-1824) and the CAC episode investigation report evaluation (HS-1823). In addition, projects undertaken this year may also provide guidance in selecting investigation priorities. These include the notification/hazard communication evaluation, closed system evaluation and evaluation of various fumigants.

The following are the priorities for WH&S involvement in episode investigation:

- Episodes involving closed systems
- Episodes involving handlers in which no violations of existing regulations were identified. WH&S can evaluate the investigation and return to ask more detailed questions.
- Episodes involving irrigators (from the posting evaluation report)
- Episodes involving early entry or notification issues (from the posting and notification reports)
- Episodes involving the 6 pesticides identified in the posting evaluation report that may have reduced protections following the implementation of WPS

Pesticide	Reduced Protection
Cyfluthrin	Shorter REI
Dimethoate	Some REIs shorter, reduced posting
Methidathion	Reduced posting requirements
Methomyl	Reduced posting requirements
Oxamyl	Reduced posting requirements
Phorate	Reduced posting requirements

- Priority episodes involving drift
- Priority episodes involving soil fumigants



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- Episodes that appear to be linked to a terrorist attack

Some of the WH&S activity in these investigations will not begin until the CAC investigative report is received. For other incidents, WH&S activity will begin once we receive initial notification. We will work with the PISP scientists to develop a method to identify possible episodes for WH&S investigation.

Please coordinate any episode investigation activities with Sue Edmiston prior to initiation of activities. Sue will need to coordinate our activities with the Enforcement Branch.

If you have any questions, please contact Sue Edmiston.

cc: Scott Paulsen
Dan Merkley